

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

STATE FARM FIRE & CASUALTY COMPANY,	:	Civ. No. 1:22-cv-00077-MPT
	:	
	:	
Plaintiff,	:	JURY TRIAL OF TWELVE
	:	DEMANDED
v.	:	
	:	
RICH ACHIEVER INC. LLC and NEW WIDETECH INDUSTRIES CO., LTD,	:	
	:	
	:	
Defendants.		

**MOTION TO DISMISS COMPLAINT PURSUANT TO
FED. R. CIV. P 12(b)(2) FOR LACK OF PERSONAL JURISDICTION**

COMES NOW, Defendant New Widetech Industries Co., Ltd. (hereinafter “NWT”), by and through their undersigned counsel, and move this Court to dismiss the Complaint pursuant to Fed. R. Civ. P. 12(b)(2)). Defendant incorporates the Opening Memorandum in Support of Defendant’s Motion to Dismiss filed contemporaneously herewith as the grounds for the motion.

Respectfully submitted,

Dated: 5/31/2022

FRANKLIN & PROKOPIK, P.C.

/s/William A. Crawford

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Attorneys for Defendants New Widetech Industries

Co., Ltd. and Rich Achiever, Limited,

Erroneously sued as Rich Achiever Inc. LLC

CERTIFICATE OF SERVICE

I, WILLIAM A. CRAWFORD, ESQUIRE, HEREBY CERTIFY that on this 31st day of May, 2022, a copy of the foregoing “Motion to Dismiss the Complaint Pursuant to Fed. R. Civ. P. 12(b)(2) for Lack of Personal Jurisdiction” and Certificate of Compliance with Page/Word Limitations and Font Requirement was electronically filed with the Clerk of the Court using the CM/ECF system, on behalf of Defendant New Widetech Industries, Co., LTD, and that a true and correct copy was served on all counsel of record by CM/ECF Electronic

Notification to:

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